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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

JIMMIE G. BILES, JR., M.D.,
a resident of Wyoming,

Plaintiff,

vs.

LISA SHAURETTE FALLON,

Defendant.

No. 11CV-294-J

DEFENDANT'S ANSWERS TO PLAINTIFF'S INTERROGATORIES

COMES NOW Defendant Lisa Shaurette Fallon, through counsel, and answers Plaintiff's

Interrogatories as follows:

1. Please identify by name, address, cell phone number and email address all persons other than yourself who were involved in any way or who you communicated with in anyway regarding the creation and dissemination of the flyer you hired Sharp Printing to mail as alleged in the Complaint. Please specify how they were involved and the substance of their involvement and information.

ANSWER:

I created the flyer named in the Complaint based upon the following information: I received a spam website message on my Facebook from someone at an email address ending in

"@bhbocysm.com" that I opened because it showed a link to the Park County Sheriff's Department website.

Attached was an email conversation between a Tammy Jones, whose phone number I do not know, that must work for Dr. Biles and from what sounds like another employee a Collette Schwandt (307-587-2139). I do not know her address. The web site was taken from the Cody Sheriff's link and the email text between these two people discussed Dr. Biles telling his staff and Ms. Jones that he was drunk and he passed out, that he refused the breath test and that the police were assholes and tried to rough him up when he was arrested.

Ms. Schwandt's information referred to "JIT" and she knew all the details of Dr. Biles resisting arrest and how drunk he was and kept asking for his lawyer. Ms. Jones referred to Dr. Biles as a "bear" and a "asshole" and he demanded his employees go into "damage control". Ms. Jones also confirmed to Ms. Schwandt that Dr. Biles' former and current employees complained that he frequently drove and drank coming from clinics and the hospital, picking up his favorite drink, Crown Royal, from several of the liquor stores around town.

I next had a conversation with Dr. Biles' employee Shern Chacon PAC (307-399-0246) shortly after this happened. I do not know her address. I called from my work to the Cody hospital asking for information on Dr. Biles and they connected me to her. I represented myself as a concerned former patient's family member and Dr. Biles' DUI was confirmed. In the course of our conversation that lasted about 15 minutes, it was obvious she was upset and she hinted Dr. Biles was in big trouble "this time" and he was yelling at everyone. She confirmed "Dr. Biles was looking for a medical condition that caused him to black out so he could defend himself against this criminal offense."

When I received this information about Dr. Biles, I spoke with people in the medical area of Cody that I have known over the years, such as CNA Tamarra Pederson, 1701 32nd St., Cody, Wyoming, 307-527-6888. I believe she works in one of the hospitals and she confirmed that all of the nurses and doctors knew about Dr. Biles' arrest.

One of my Grandmother's former physicians and now family friend practicing in the area is Dr. Schneider, 2877 Overland Ave., Billings, Montana, 307-587-0777 or 307-399-6410, info@omnispinecenter.com. I spoke once or twice with Dr. Schneider who informed me he heard of Dr. Biles' DUI and the sheriff's web site from a filer that one anesthesia doctor, who Dr. Biles helped run out of town, made about Dr. Biles. Dr. Schneider also told me of Dr. Biles' drunk car accident before this DUI, in which a hospital scrub nurse, "Destiny", had to pick him up in the middle of the night because he was drunk and left his wrecked car at the side of the road. I subsequently learned from Dr. Schneider that Dr. Biles has complaints to the Board of Medicine in Wyoming from his former PAC Scott Wilson, who works for Dr. Gee in Cody and Harley

Morrell PAC who works for Dr. Schneider. They reported Dr. Biles because he was alcohol impaired while in the operating room and drunk while seeing patients.

Dr. Schneider told me of his own experience with Dr. Biles changing medical records and how Dr. Biles was trying to run Dr. Steve Emery out of town (semery@bortho.com, 307-527-3355). He also indicated that Dr. Biles was also trying to run him out of town. Dr. Schneider said none of the other orthopedic surgeons liked Dr. Biles or would work with him, so he was not invited to be part of their group. Dr. Schneider said he would give my attorney a voice recording of Dr. Biles calling an anesthesiologist, Sandra Whalen in Cody, in which Dr. Biles left a long message on her cell phone's answering machine where he admits to running Dr. Cohen out of town and says he is running Dr. Emery out of town as well.

I did ask Dr. Schneider why someone was not telling the community about Dr. Biles, as he is a danger to both patients as well as the public with his alcohol abuse and his attacking so many other doctors. Dr. Schneider said Dr. Biles was a bully and people tried to stay away from him, but he did indicate that the sheriff's web site was a public disclosed document and letting people know about it was both ethical and true. Dr. Schneider also said that the story of Dr. Biles fighting with the police and that he was so drunk he couldn't walk was common knowledge in the hospital and at the surgery center. He said many of the doctors (Dr. Schmidt, Dr. Emery, Dr. Meyer, Dr. Tilden, Dr. Slight, Dr. Divensense, Dr. Hansen, Dr. Segar, Dr. Morton, and others) talked about it since the hospital now had to deal with the public knowledge that one of the physicians on active medical staff at the hospital was involved in a criminal offense and Dr. Biles was considered an "impaired physician" by the credentialing and executive committee. Since I deal with impaired physicians and medical personnel in Indiana, we discussed how this is addressed in my hospital.

In the course of our conversation, I asked Dr. Schneider how he communicates to patients and prospective patients in the area. He said with direct mailers. I told him I thought everyone should know about Dr. Biles and I asked him if I could buy the addresses he uses in his mailers to use at my discretion. Schneider said that they were public files that anyone can use and they did not specifically come from his patient database and were not "his patients" so he had no problem just giving me a labels database from Park County and its surrounding counties. I did not pay for them and Dr. Schneider did not ask for any payment, he just mailed them to me on a stick drive. I did not go through it, I just gave that stick drive with the flyer I made and the labels to the printer. I told Dr. Schneider I was going to send a note to everyone telling them to look at the sheriff's website. He laughed and said "Dr. Biles deserves it, as he is a menace to the community of doctors and he was probably going to kill someone when he was drunk."

I believe Dr. Schneider may have had concerns for my well being, even with knowing the truth about Dr. Biles as he told me Dr. Biles was very litigious and even sued his own mother years ago. After I had decided to send the flyer I created from the sheriff's department web site,

Dr. Schneider did call me once and I returned his call when I was with the printer. I believe the flyer I created needed to be sent, even though Dr. Schneider indicated that the truth about Dr. Biles would be coming out in a lawsuit he was involved in. I think he spoke with the printer to caution against sending anything, but the printer said he already sent the flyer. I next spoke to Dr. Schneider about this one time after he received the flyer in the mail. He only said "that was creative and I am sure lots of people are looking at the sheriff's website now." He said he did not know of anyone else that said they received the flyer.

2. Please identify by name, address, cell phone number and email address the person or persons whose money you used to draw a cashier's check to pay Sharp Printing for the mass mailing, and please describe how and when you received and when and where you deposited the funds from this other person or persons.

ANSWER: Funds were from multiple sources, some of which I borrowed from friends and relatives; for example, my mother, Lynne Shaurette, and my daughter's Godmother, Michelle Esparza, over time without their specific knowledge of how I used the money. I chose to use my money and some of these other monies for this cause. I have repaid any money back to people over the last year who requested money be paid back from any money borrowed.

3. Please identify how you came into possession of the mailing list of Wyoming address that you gave to Sharp Printing, including the name, address, cell phone number and email address of any person or person(s) who were involved in any way or who you communicated with in any way regarding the creation and use of the mailing list.

ANSWER: See answer to Interrogatory No. 1.

4. Please identify by name, address, cell phone number and email address all person(s) who you have ever communicated with at any time or in any way regarding the Plaintiff, the Plaintiff's business, and/or the Plaintiff's family, and describe the timing and factual basis of those communications.

ANSWER: Please see answer to Interrogatory No. 1. I am very familiar with the medical doctors in Cody as my relatives live in Belfry, Montana. Years ago, in the late 1990s, I think my now deceased grandmother used Dr. Celia Stanforce Dacre for pain management as a rehab doctor. I went to a few appointments. She was wonderful but was run out of town by Dr. Biles and I talked to her years ago about this and she was very sad. I have her email address only, cdacre@wyoming.com. My grandmother switched to Dr. Jerry Smith, but then Dr. Biles ran him out of town as well. I think he sued Dr. Biles and won. I don't have his address. I met a Stacia Jensen years ago who was friends with Tamarra Pederson, CNA. Ms. Jensen lived in Cody. She worked for Dr. Biles. I remember Stacia was very upset once when we talked about her job, since I was interested in going into nursing and Tamarra was a CNA. She said her boss,

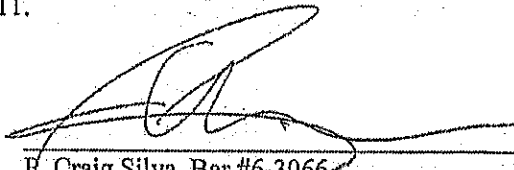
Dr. Biles, was always drinking when he was driving them home from clinic, always making sexual passes at her and very mean to her. She told a group of us that he would routinely pick up a fifth of whiskey and drink and drive home from clinics, that he was always trying to sleep with her and he would say very nasty things about his wife.

A few years ago I heard from a lady who saw Dr. Gee as a patient, who was friends with my grandmother, I don't recall her name. Someone in Dr. Gee's office said that Dr. Biles was at it again saying nasty things about Dr. Gee. I do not know Dr. Gee. The other story from that office was that Dr. Biles had pulled a rifle out and aimed it at a radiology worker in their office and no one wanted to work in that building near Dr. Biles.

5. Of the person or persons you identified above, describe the nature of your relationship with each, and please include a description of how you met, how long you've known each other, how often you communicate, and by what means you communicate, e.g., cell phone, email, Facebook messaging, etc.

ANSWER: See answers listed above.

Dated this 1st day of November, 2011.



R. Craig Silva, Bar #6-3066
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P. O. Box 10700
Casper, WY 82602
307.265.0700

VERIFICATION

STATE OF INDIANA)

)SS

COUNTY OF _____)

Lisa Fallon, being first duly sworn upon her oath, being of sound mind and lawful age, states that she has read the foregoing Answers to Interrogatories, knows the contents thereof and that the same are true.

Lisa Fallon

Subscribed, sworn to and acknowledged before me by Lisa Fallon this _____ day of November, 2011.

Notary Public

My commission expires: _____

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the following upon M. Kristeen Hand and R. Daniel Fleck, P. O. Box 548, Jackson, WY 83001 and William L. Simpson, P. O. Box 490, Cody, WY 82414 by mailing same to them this 1st day of November, 2011.



R. Craig Silva